



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

AFM/KCB  
F. #2018R01047

271 Cadman Plaza East  
Brooklyn, New York 11201

October 9, 2023

By ECF

The Honorable Joan M. Azrack  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Jack Cabasso, et al.  
Criminal Docket No. 19-582 (JMA) (ARL)

Dear Judge Azrack:

The parties respectfully submit this joint motion to adjourn until November 7, 2023 at 1:30 PM the status conference that is presently scheduled for tomorrow, October 10, 2023, and to exclude time pursuant to the Speedy Trial Act until that later date. The parties remain in discussions about a potential resolution short of trial, and require additional time to complete those discussions so that they can advise the Court about whether they intend to request a trial date in this matter. The government expects that by November 7, 2023 the parties will be ready to so advise the Court.

Due to the volume of discovery, number of defendants, extent of the fraud charged in the indictment, and related factors, this case has been designated a complex case, under 18 U.S.C. § 3161(h)(7)(B)(ii), since its inception. See ECF No. 90. The parties jointly submit that time should be excluded from the speedy trial clock through the date of the status conference set by the Court, because the ends of justice served by excluding time to allow the parties to continue discussions regarding a potential disposition short of trial without the need to begin preparations for the trial of this case, outweigh the best interest of the public and the defendants in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A).

The government has consulted with defense counsel Barry Zone, Esq., for defendant Jack Cabasso, Kenneth J. Kaplan, Esq., for defendant Frances Cabasso, and Samuel Braverman, Esq., for defendant Aventura Technologies, Inc., who each join in this request.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/  
Alexander F. Mindlin  
Kayla C. Bensing  
Assistant U.S. Attorneys  
(718) 254-7000

cc: Clerk of Court (by ECF) (JMA) (ARL)  
All counsel of record (by ECF)